

Southern Communications Services, Inc.
d/b/a/ Southern Linc
5555 Glenridge Connector, Suite 500
Atlanta, Georgia 30342

April 6, 2020

VIA ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: Review of the Commission’s Rules Governing the 896-901/935-940 MHz Band; WT Docket No. 17-200

Dear Ms. Dortch:

Southern Communications Services, Inc. d/b/a Southern Linc (“Southern Linc”) submits this letter in response to a recent *ex parte* filing in this docket by NextEra Energy, Inc. (“NextEra”) and its subsidiary Florida Power & Light (“FPL”).¹ In its Letter, NextEra selectively takes a passage from a previous filing by Southern Linc out of context to support a position that is neither supported nor endorsed by Southern Linc, nor accurately reflective of Southern Linc’s actual, real-world experience in deploying its LTE network, including a transition period during which Southern Linc simultaneously operated both LTE and narrowband iDEN platforms on adjacent 800 MHz channels.²

Specifically, NextEra claims in its Letter that Southern Linc “confirms that the ‘near/far’ issue between disparate technologies is a cause of potential interference” that requires the adoption of a guard band between broadband and narrowband operations in the 900 MHz band.³ In fact, Southern Linc stated exactly the opposite – namely, that Southern Linc’s experience demonstrated that such a guard band is *not* necessary. To clarify the record, copied below is the complete paragraph in Southern Linc’s filing from which NextEra selectively extracted its citation:

¹ / Letter from Timothy J. Cooney, Counsel to NextEra Energy, Inc. to Marlene H. Dortch, Secretary, Federal Communications Commission, WT Docket No. 17-200 (filed March 31, 2020) (“NextEra *Ex Parte* Letter”).

² / NextEra *Ex Parte* Letter at 2-3, *citing* Letter from Michael D. Rosenthal, Southern Communications Services, Inc. d/b/a Southern Linc, to Marlene H. Dortch, Secretary, Federal Communications Commission, WT Docket No. 17-200 (filed Dec. 11, 2019) (“Southern Linc Dec. 11 *Ex Parte*”).

³ / *Id.*

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Southern discussed with the Bureau Southern Linc's experience in deploying its LTE network, which required Southern Linc to simultaneously operate both LTE and iDEN platforms on its 800 MHz frequencies until all of its iDEN customers could be transitioned to LTE. **Based on its real-world deployment experience, Southern believes that a guard band between broadband and narrowband operations in the 900 MHz band is unnecessary and that the most important factor in mitigating any potential interference between broadband and narrowband operations is site selection and deployment.** In particular, Southern explained that Southern Linc performed extensive lab testing before its LTE deployment began in order to determine whether (narrowband) iDEN and LTE could co-exist. Southern Linc performed these tests both with no guard band and with a 100 kHz guard band and found that the results were the same in either case. Southern Linc concluded that any interference between the LTE and iDEN signals was a "near/far" issue rather than a "guard band" issue and thus focused on site selection as it deployed its LTE system. This conclusion was supported by Southern Linc's real-world results; the company deployed and operated both LTE and iDEN together on a system with approximately 80,000 iDEN users and did not receive a single complaint.⁴

In its Letter, NextEra asserts that "[n]o major technology development has been identified that allows incompatible LTE broadband and narrowband technologies to operate adjacent to each other, absent a guard band, without LTE causing interference to narrowband operators."⁵ As described above, however, Southern Linc has already conclusively demonstrated that no "major technology development" is needed to enable LTE and narrowband technologies to operate adjacent to each other without a guard band – rather, it is simply a matter of site selection, which is a fundamental element of any network deployment regardless of technology or frequency band.

In addition, NextEra included with its Letter an attached report that the Utilities Technology Council ("UTC") made available to its members, which NextEra characterizes as supporting its push for a guard band.⁶ Southern Linc was directly involved in the UTC discussions regarding the Report and would like to clarify for the record that this Report was not endorsed by UTC due to concerns raised by various UTC member utilities – including Southern Company – about significant flaws and inaccuracies in the Report's underlying testing methodology and assumptions. Southern Linc further clarifies that many of the assumptions made in the Report either do not match or are directly contradicted by Southern Linc's actual LTE network deployment experience.

⁴ / Southern Linc Dec. 11 *Ex Parte* at 2 (emphasis added).

⁵ / NextEra *Ex Parte* Letter at 3.

⁶ / See NextEra *Ex Parte* Letter, Attachment ("Report").

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In accordance with Section 1.1206 of the Commission's rules, this letter is being filed electronically in the above-referenced proceeding.

Respectfully submitted,

/s/ Michael D. Rosenthal

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Southern Linc